



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

M60050.002545
MCAS EL TORO
SSIC #5090.3

July 24, 2001

BRAC Environmental Coordinator
Base Realignment and Closure, Environmental Division
Attn: Mr. Dean Gould
P.O. Box 51718
Irvine, CA 92619-1718

RE: Draft Site Specific Environmental Baseline Survey Report and Draft Federal Agency-to-Agency Property Transfer for Site 1, Marine Corps Air Station, El Toro, dated July, 2001

Dear Mr. Gould:

EPA has reviewed the above-referenced documents and provides the following comments:

Draft Site Specific Environmental Baseline Survey

1. p. 4-15, Section 4.6.2, Surface Soil: In bullet number 2 of this section, the Navy refers to TPH when it should be TPH.
2. p. 8-1, Section 8.2, Conclusions: The Navy states that perchlorate is not a hazardous substance as defined by state and Federal regulation. While this may be accurate, perchlorate can be defined under section 101(33) of CERCLA as a hazardous pollutant or contaminant.

Draft Federal Agency-to-Agency Property Transfer

1. p. 6-4, Classification of Parcel 5A2, and p. 10-1, Statement of Finding of Environmental Suitability: The Navy classifies the subparcel as area type 1 which is defined as "areas where no release or disposal of hazardous substances or petroleum products has occurred (including no migration of these substances from adjacent areas)". However, as described in the Site Specific EBS, RDX was found at levels exceeding PRGs as well various TPH constituents. It appears that this area should be more accurately described as category 3.

If you have any questions, please call me at (415) 744-2366.

Sincerely,

Nicole G. Moutoux
Nicole G. Moutoux
Project Manager
Federal Facilities Cleanup Branch

received
7/31/01

cc: Don Whittaker, SWDIV
Triss Chesney, DTSC
Patricia Hammon, RWQCB
Greg Hurley, RAB Community Co-Chair
Marcia Rudolph, RAB Subcommittee Chair